

EPA REGION 4 VIRGINIA-CAROLINA CHEMICAL PHOSPHATE/FERTILIZER INITIATIVE

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ABSTRACT

The purpose of this presentation is to provide information regarding the Virginia Carolina Chemical (VCC) Phosphate/Fertilizer Initiative. The Initiative was developed in the year 2000, and involves the use of a two-phased management approach to identify, characterize, and address contamination at numerous former VC Chemical phosphate/fertilizer manufacturing facilities throughout Region 4. Given the level of understanding about the phosphate/fertilizer manufacturing process, the contaminants associated with these facilities, and the fate and transport of the contaminants, much of the work typically required for both pre-CERCLIS investigations and Remedial Investigation is not warranted. For this reason, the objective of the Initiative is to use a stream-lined approach to focus on developing and implementing the necessary response actions that are protective of human health and the environment as defined by CERCLA.

Phase 1 of the Initiative has been completed, and involved defining the "universe" of 40 former VCC facilities, and prioritizing the facilities for site reconnaissance and screening. Those facilities identified as having the highest potential risk will be addressed first. Phase 2 of the Initiative will begin in the near future to focus on site characterization and cleanup activities on those sites where warranted, using Time-Critical Removal Actions, Non Time-Critical Actions, and other NCP equivalent actions. Response actions at these facilities will be determined by a dedicated project team consisting of EPA Region 4 and Exxon Mobil representatives, the successors of VCC environmental liabilities.

The project team will employ several management strategies which should help expedite remedy selection and implementation. Using model Administrative Orders on Consent (AOCs) will speed up negotiations by reducing the unnecessary wrangling over legal language. Using existing site assessment data when available, the team will establish a site characterization strategy to eliminate duplication of effort each time the need arises to investigate contaminant distribution. Developing a presumptive remedy approach will expedite the selection and implementation of a remedy at those facilities needing cleanup. Using these management strategies will not only expedite remedy selection and implementation, but will help provide consistency in decision-making.



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